

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2021-88-E

In the Matter of:)	<u>APPLICATION TO APPROVE AND</u>
Dominion Energy South Carolina,)	<u>ESTABLISH PURSUANT TO S.C.</u>
Incorporated's Avoided Cost Proceeding)	<u>CODE ANN. SECTION 58-41-20(A)</u>
Pursuant to S.C. Code Ann. Section)	<u>THE STANDARD OFFER, AVOIDED</u>
58-41-20(A))	<u>COST METHODOLOGIES, FORM</u>
)	<u>CONTRACT POWER PURCHASE</u>
)	<u>AGREEMENTS, COMMITMENT TO</u>
)	<u>SELL FORMS, AND ALL OTHER</u>
)	<u>APPROPRIATE TERMS AND</u>
)	<u>CONDITIONS</u>
)	

Pursuant to Public Service Commission of South Carolina ("Commission") Order No. 2021-166, S.C. Code Ann. § 58-41-20(A), and S.C. Code Ann. Regs. § 103-823, Dominion Energy South Carolina, Incorporated ("DESC" or "Company") hereby complies with the Commission's direction to file its application for approval of the standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and all other appropriate terms and conditions ("Section 58-41-20(A) Items") that it proposes to use until at least such time as an Order is issued in the next Section 58-41-20(A) proceeding, and respectfully requests that these Section 58-41-20(A) Items be approved by the Commission. In accordance with South Carolina law, DESC is providing a copy of this application (the "Application") to the South Carolina Office of Regulatory Staff ("ORS").

In support of the Section 58-41-20(A) Items proposed in the Application, DESC would respectfully show the following:

THE APPLICANT

1. DESC is a corporation duly organized and existing under the laws of the State of South Carolina, with its principal offices in Cayce, South Carolina. DESC's mailing address is 220 Operation Way, Cayce, South Carolina 29033. The Company is engaged in, among other things, the business of generating, transmitting, delivering, and providing electricity to public and private energy users for compensation.

2. DESC operates an integrated electric utility system that serves approximately 760,000 customers in 24 counties in central, southern, and southwestern South Carolina. DESC's service territory covers nearly 16,000 square miles in South Carolina including the metropolitan areas of Charleston, Columbia, Beaufort, and Aiken, and it also includes many other smaller cities, towns, and rural areas in South Carolina.

3. DESC has 991.2 megawatts ("MW") of solar photovoltaic generation systems comprised of residential, commercial, utility scale and community solar. With respect to utility-scale (i.e., non-rooftop) solar specifically, in the summer of 2019, the nameplate capacity of utility-scale solar generation on the DESC system was approximately 485 MW. For the summer of 2020, the nameplate capacity of utility-scale solar generation on the DESC system exceeded 849 MW—an approximately 75% increase year-over-year—with utility-scale solar generation capacity expected to exceed 1,000 MW in the near future. In total, there are approximately 4,215 MW of additional applications for solar projects pending in DESC's state and federal queues.

4. DESC's highest recorded daytime system load was 4,970 MW on February 20, 2015, while DESC's average daily peak load is less than 3,300 MW. To put this into perspective, DESC recently ranked first in the state for the amount of distributed solar on its

system. Additionally, DESC ranks second—among the 13 largest utilities in the Southeast—with 807 solar watts per customer, which is 2.5 times the average for the region.

5. All pleadings, correspondence and communication relating to this Application should be addressed to the following, who are authorized representatives to accept service on behalf of the Company in this proceeding.

K. Chad Burgess
 Matthew W. Gissendanner
 Dominion Energy South Carolina, Incorporated
 Mail Code C222
 220 Operation Way
 Cayce, SC 29033
 (803) 217-8141
 kenneth.burgess@dominionenergy.com
 matthew.gissendanner@dominionenergy.com

Mitchell Willoughby
 Tracey C. Green
 Willoughby & Hoefer, P.A.
 P.O. Box 8416
 Columbia, SC 29202
 (803) 252-3300
 mwilloughby@willoughbyhoefer.com
 tgreen@willoughbyhoefer.com

6. Section 58-41-20(A) requires the Commission, at least once every 24 months after the preceding approvals, to “approve each electrical utility’s standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and any other terms or conditions necessary to implement this section.”

7. The Commission opened this docket on March 10, 2021, pursuant to Section 58-41-20(a) and directed DESC to file an application on April 22, 2021.

8. In Order No. 2021-166, the Commission set forth the following schedule for this matter:

Event	Proposed Date
Application Filed with the Commission	April 22, 2021
Intervention Deadline	May 28, 2021
Company Direct Testimony Due	June 29, 2021
All Other Parties' Direct Testimony Due	July 13, 2021
Rebuttal Testimony Due	July 27, 2021
Surrebuttal Testimony Due	August 10, 2021
Hearing Date	Beginning Wed., Aug 18, 2021 and *Continued As Necessary*

9. DESC respectfully submits this Application in accordance with and in response to the Commission's directive.

10. Consistent with the Commission's order, DESC will develop and submit for review and approval its current proposals and recommendations for its standard offer, avoided costs methodologies, form contract power purchase agreements, commitment to sell forms, and all other appropriate terms and conditions as part of filing its direct testimony in this proceeding.

Background

11. Act No. 62 directs the Commission

to address all renewable energy issues in a **fair and balanced manner, considering the costs and benefits to all customers** of all programs and tariffs that relate to renewable energy and energy storage, both as part of the utility's power system and as direct investments by customers for their own energy needs and renewable goals. The commission also is directed to ensure that the revenue recovery, cost allocation, and rate design of utilities that it regulates are **just and reasonable** and properly reflect changes in the industry as a whole, the benefits of customer renewable energy, energy efficiency, and demand response, as well as any utility or state specific impacts unique to South Carolina which are brought about by the consequences of this act.

S.C. Code Ann. § 58-41-05.

12. Stated differently, Act No. 62 encourages the development of renewable energy resources, such as solar generation, in a manner that is fair and balanced to all customers of all

programs related to renewable energy and energy storage, and makes clear that revenue recovery, cost allocation, and rate design of utilities should be just and reasonable.

13. Act No. 62 further establishes procedures to ensure that qualifying facilities (“QFs”) are properly compensated for the energy they produce, as is required by the Public Utility Regulatory Policies Act of 1978 (“PURPA”), while at the same time mandating that costs not be shifted onto other utility customers resulting in the subsidization of such programs.

14. In this manner, Act No. 62 is designed to ensure that the Company determines its costs and sets its rates at just and reasonable levels and to implement the programs required by the act, while also preventing the shifting of costs to customers.

15. DESC’s current standard offer, avoided cost methodologies, firm contract power purchase agreements, commitment to sell forms, and other appropriate terms and conditions were approved by the Commission in Order No. 2019-847, dated December 9, 2019, and Order No. 2020-244, dated March 24, 2020, issued in Docket No. 2019-184-E.

16. In Order No. 2019-847 and Order No. 2020-244, the Commission approved the Company’s use of the Difference in Revenue Requirements (“DRR”) methodology and further approved the following avoided energy and capacity costs, as well as the variable integration charge, for the Company’s Rate PR-1 for non-solar and solar QFs:

PR-1 RATE: AVOIDED ENERGY COST
Non-Solar QFs (\$kWh)

	<u>Summer</u> (June-September)	<u>Winter</u> (October-May)
On-Peak	\$0.03075	\$0.03330
Off-Peak	\$0.02566	\$0.03363

**PR-1 RATE: AVOIDED ENERGY COST
Solar QFs (\$kWh)**

	<u>Summer</u> (June-September)	<u>Winter</u> (October-May)
On-Peak	\$0.03075	\$0.03330
Off-Peak	\$0.02566	\$0.03363

**PR-1 RATE: AVOIDED CAPACITY COST
Non-Solar QFs (\$/kWh)**

Time Period	(\$/kWh)
December thru February, 6:00 a.m. to 9:00 a.m.	0.24725

**PR-1 RATE: AVOIDED CAPACITY COST
Solar QFs (\$/kWh)**

Time Period	(\$/kWh)
Year-Round	0.00379

**PR-1 RATE: VARIABLE INTEGRATION CHARGE
Solar QFs (\$/kWh)**

Time Period	(\$/kWh)
Year-Round	0.00096

17. The Commission further approved in Order No. 2019-847 and Order No. 2020-244 the following avoided energy and capacity costs, as well as the variable integration charge, for DESC's proposed Rate PR-Standard Offer for non-solar and solar QFs:

**STANDARD OFFER RATE: AVOIDED ENERGY COST
Non-Solar QFs (\$/kWh)**

Time Period	Peak Season Peak Hours (\$/kWh)	Peak Season Off-Peak Hours (\$/kWh)	Off-Peak Season Peak Hours (\$/kWh)	Off-Peak Season Off-Peak Hours (\$/kWh)
2020-2029	0.03105	0.02751	0.03252	0.02893

**STANDARD OFFER RATE: AVOIDED ENERGY COST
Solar QFs (\$/kWh)**

Time Period	Peak Season Peak Hours (\$/kWh)	Peak Season Off-Peak Hours (\$/kWh)	Off-Peak Season Peak Hours (\$/kWh)	Off-Peak Season Off-Peak Hours (\$/kWh)
2020-2029	0.03105	0.02751	0.03252	0.02893

**STANDARD OFFER RATE: AVOIDED CAPACITY COST
Non-Solar QFs (\$/kWh)**

Time Period	(\$/kWh)
December thru February, 6:00 a.m. to 9:00 a.m.	0.24725

**STANDARD OFFER RATE: AVOIDED CAPACITY COST
Solar QFs (\$/kWh)**

Time Period	(\$/kWh)
Year-Round	0.00379

**STANDARD OFFER RATE: VARIABLE INTEGRATION CHARGE
Solar QFs (\$/kWh)**

Time Period	(\$/kWh)
Year-Round	0.00096

18. The Commission approved in Order No. 2020-244 an avoided capacity value of 11.8% based on a methodology recommended by ORS Witness Brian Horii, finding that his

methodology yielded a value that “is reflective of the actual avoided capacity value for solar at this time.”

19. The Commission also approved in Order No. 2020-244 a variable integration charge (“VIC”) of \$0.96/MWh for Solar QFs as a “temporary, interim value until a more accurate cost can be determined through an integration study,” and further directed that, “[o]nce a more accurate rate is determined, the VIC/EIC will be subject to a true-up, either up or down, depending on the actual integration cost indicated by the integration study.” Pursuant to S.C. Code Ann. § 58-37-60, which authorizes the Commission to conduct an integration study using its own consultant, the Commission in Order No. 2020-583 directed the Clerk to “open a new docket or dockets for consideration of the utility integration studies,” which was done for DESC in Docket No. 2020-219-A, “Utility Integration Studies of Dominion Energy South Carolina, Incorporated (Pursuant to Commission Directive Order No. 2020-583).” The process contemplated in Docket No. 2020-219-A remains pending.

20. The Commission also approved in Order No. 2019-847, subject to modifications in Order No. 2020-244, the Company’s current Rate PR-1, Rate PR-Standard Offer, Rate PR-Avoided Cost Methodology, Rate PR-Form PPA tariffs, and the Notice of Commitment Form (“NOC Form”). The current Rate PR-Avoided Cost Methodology, Rate PR-Form PPA tariffs, and NOC Form were filed with the Commission by letter dated December 19, 2019, pursuant to Order No. 2019-847. The current and Rate PR-1 and Rate PR-Standard Offer tariffs revised pursuant to Order No. 2020-244 were filed with the Commission by letter dated March 26, 2020.

21. The Commission in Order No. 2020-244 direct a limited rehearing on the issue of power purchase agreement (“PPA”) durations for longer than ten years, as well as related terms and conditions. However, the parties requesting a rehearing, South Carolina Solar Business

Alliance, Inc., South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, and Johnson Development Associates, Inc., withdrew their request by letter dated June 17, 2020, and the hearing contemplated for considering the limited issue of PPA durations was cancelled.

Standard Offer

22. Under PURPA, a standard offer is a PPA that contains established terms and an avoided cost rate paid to eligible QFs that are 100 kW-AC or less. Although PURPA set the threshold at 100 kW-AC, states have the flexibility to increase that threshold.

23. Under Act 62, the General Assembly increased that threshold to 2 MW. Specifically, S.C. Code Ann. § 58-41-10(15) states that a standard offer is “the avoided cost rates, power purchase agreement,¹ and terms and conditions approved by the [C]ommission and applicable to purchases of energy and capacity by electrical utilities ... from small power producers up to two megawatts AC in size.” (“Standard Offer”). Additionally, the Standard Offer contract sets the terms and conditions and allows any small power producer, as defined by S.C. Code Ann. § 58-41-10(14), to contract with the utility to supply electricity at established rates without the need to negotiate individual contracts.

24. The Standard Offer essentially provides an open contract executed by the utility with established prices, terms, and conditions that are not open for negotiation by DESC or the eligible QF.

25. Consistent with and pursuant to the Commission’s scheduling Order, the Company will submit a Standard Offer for review and approval as part of filing its direct testimony in this

¹ “‘Power purchase agreement’ means an agreement between an electrical utility and a small power producer for the purchase and sale of energy, capacity, and ancillary services from the small power producer’s qualifying small power production facility.” S.C. Code Ann. § 58-41-10(9).

proceeding. This Standard Offer will contain prudent and commercially reasonable terms and conditions, including but not limited to reasonable terms for avoided costs, liquidated damages and extension payments, and guaranteed energy production.

26. The proposed Standard Offer will also contain terms and conditions for solar-only generation and non-solar generation projects.

Avoided Cost Methodologies

27. As defined by both PURPA regulations and Act No. 62, “avoided costs” are “the incremental costs to an electric utility of electric energy or capacity or both which, but for the purchase from [QFs], such utility would generate itself or purchase from another source.” 18 C.F.R. § 292.101(b)(6); S.C. Code Ann. § 58-41-10(2).

28. The Federal Energy Regulatory Commission (“FERC”) further recognizes that avoided costs include two components: “energy” and “capacity.” Specifically, “[e]nergy costs are the variable costs associated with the production of electric energy (kilowatt-hours). They represent the cost of fuel, and some operating and maintenance expenses. Capacity costs are the costs associated with providing the capability to deliver energy; they consist primarily of the capital costs of facilities.” *Small Power Production and Cogeneration Facilities; Regulations Implementing Section 210 of the Public Utility Regulatory Policies Act of 1978*, Order No. 69, 45 Fed. Reg. 12,214, 12,216 (Feb. 25, 1980).

29. The Commission also has recognized in Order No. 81-214, dated March 20, 1981, Docket No. 80-251-E, and in subsequent decisions that electric utilities are entitled to recover from customers their avoided costs paid to QFs under PURPA.

30. Importantly, PURPA does not require electric utilities to pay QFs more than their avoided costs. To the contrary, PURPA specifically provides that PURPA’s implementing

regulations also expressly provide that “[n]othing ... requires any electric utility to pay more than the avoided costs for purchases” from QFs. 18 C.F.R. § 292.304(a)(2).

31. Congress intended the avoided cost rate to serve as an “upper limit on the price at which utilities can be required under this section to purchase electric energy.” Joint Conference Comm. Report, H.R. Conf. Rep. No. 95–1750, at 98, 1978 U.S.C.C.A.N. 7797, 7832. By setting a ceiling of incremental cost on the amount a utility should be required to pay for a QF's power, Congress expressed that PURPA is “not intended to require the rate payers of a utility to subsidize cogenerators or small power [producers].” Joint Conference Comm. Report, H.R. Conf. Rep. No. 95–1750, at 98, 1978 U.S.C.C.A.N. 7797, 7832; *see also* 16 U.S.C. § 824a-3(b); 16 U.S.C. § 824a-3(d) (1988); 18 C.F.R. § 292.301(b)(6); *Connecticut Light & Power Co.*, 70 FERC ¶ 61,012, at 61,023, 61,028, *recons. denied*, 71 FERC ¶ 61,035, at 61,151 (1995).

32. For these reasons, PURPA operates to equalize the rate charges for utility power plant additions and utility purchases of QF power to ensure that customers do not pay more for electricity under either option.

33. Act No. 62 does not establish or provide additional benefits or incentives for solar generating facilities, other than the payment of the utility's avoided cost. To the contrary, S.C. Code Ann. § 58-41-20(A) provides that “[a]ny decisions by the [C]ommission shall be just and reasonable to the ratepayers of the electrical utility ... and shall strive to reduce the risk placed on the using and consuming public.”

34. Thus, if a utility's avoided costs are calculated correctly and accurately reflect the utility's avoided costs, customers are not impacted by, and are economically indifferent to, purchases of QF power instead of the cost to construct and operate additions to utility power plant, and the solar generator is able to secure a non-discriminatory rate equal to DESC's avoided costs.

35. Thus, under PURPA and Act No. 62, utilities are only required to pay QFs and QFs are only entitled to recover the utility's avoided costs, and nothing more. A contrary conclusion would force customers to subsidize privately held QF projects, including privately owned solar generating facilities, which would be at odds with S.C. Code Ann. § 58-41-20(A).

36. As intended by PURPA and Act No. 62, the Company carefully calculates its avoided costs so that customers are not required to subsidize QFs through the payment of excessive rates and, instead, are economically indifferent to the purchases.

37. In considering the avoided cost methodologies to be approved in this proceeding, S.C. Code Ann. § 58-41-20(B) requires the Commission to

treat small power producers on a fair and equal footing with electrical utility owned resources by ensuring that:

(1) rates for the purchase of energy and capacity fully and accurately reflect the electrical utility's avoided costs; ... and

...

(3) each electrical utility's avoided cost methodology fairly accounts for costs avoided by the electrical utility or incurred by the electrical utility, including, but not limited to, energy, capacity, and ancillary services provided by or consumed by small power producers including those utilizing energy storage equipment. Avoided cost methodologies approved by the commission may account for differences in costs avoided based on the geographic location and resource type of a small power producer's qualifying small power production facility.

38. In considering the avoided cost methodology to be approved in this proceeding, the Commission also must consider the nature and characteristics of solar QFs, which comprise the vast majority of renewable energy small power producers that are the focus of Act No. 62.

39. The FERC outlined the following factors to consider when accounting for the avoided costs arising from the availability of capacity or energy from a QF during peak periods:

(a) The ability of the electric utility to dispatch the qualifying facility;

- (b) The expected or demonstrated reliability of the qualifying facility;
- (c) The terms of any contract or other legally enforceable obligation, including the duration of the obligation, termination notice requirement and sanctions for non-compliance;
- (d) The extent to which the scheduled outages of the qualifying facility can be usefully coordinated with scheduled outages of the electric utility's facilities;
- (e) The usefulness of energy and capacity supplied from a qualifying facility during system emergencies, including its ability to separate its load from its generation;
- (f) The individual and aggregate value of energy and capacity from qualifying facilities on the electric utility's system; and
- (g) The smaller capacity increments and the shorter lead times available with additions of capacity from qualifying facilities.

18 C.F.R. § 292.304(e)(2)(ii).

40. These factors necessarily contain considerations specific to that QF and its specific generation, and also broader system considerations, such as the incremental benefit of adding such increment of generation when compared to existing generation already on the system. For example, adding more and more of same renewable energy fuel source to a utility's system does not necessarily mean that ratepayers see a corresponding benefit. At some point, each additional unit procured of the same variable energy source provides less benefit to the system than the previous unit of that energy source. This is particularly true where there is a single, intermittent fuel source that dominates the renewable portfolio. If avoided cost rates are steady and not responding to the incremental generation, particularly as the utility reached a saturation point, then this would necessarily mean that the utility is paying more for that energy than what it is worth to the utility.

41. The Company proposes to continue using the Difference in Revenue Requirements ("DRR") methodology approved in Order No. 2019-847, which the Commission found in Order No. 2019-847 is "reasonable and prudent; satisf[ies] the requirements of PURPA, FERC's implementing regulations and guidelines, and Act No. 62; [is] just and reasonable; [is]

non-discriminatory to small power producers; and [has] the ability to reduce the risk placed on the using and consuming public.

42. As discussed above, Docket No. 2020-219-A, “Utility Integration Studies of Dominion Energy South Carolina, Incorporated (Pursuant to Commission Directive Order No. 2020-583)” remains pending. Therefore, in this proceeding, the Company will propose an updated VIC calculation based on the Company’s operating system and pursuant to a study to be commissioned by the Company. This VIC will be subject to true-up in accordance with Order No. 2020-244, either up or down, when compared with the interim VIC of \$0.96/MWh.

43. Consistent with the discussion above, as more solar-only QFs are added to the Company’s existing lineup, the avoided costs for that type of solar generator decrease, leading to different avoided costs for this type of solar generator versus other types of QF generators. To properly reflect the Company’s avoided costs and avoid having other customers subsidize solar-only QFs, it will be necessary to implement different avoided costs for solar-only QFs versus other entities.

44. Consistent with and pursuant to the Commission’s scheduling Order, the Company will develop and propose reasonable and prudent Rate PR-1 and Rate PR-Standard Offer- tariffs for review and approval by the Commission that satisfy the requirements of PURPA, FERC’s implementing regulations and guidelines, and Act No. 62; are just and reasonable; are non-discriminatory to small power producers; and have the ability to reduce the risk placed on the using and consuming public.

45. Because the Company proposes to maintain the current DRR methodology, it does not propose to update its Rate PR-Avoided Cost Methodology tariff in this proceeding but requests that the Commission approve the continuation of that tariff.

Form Contract PPA

46. A form contract PPA (“Form PPA”) is similar to a Standard Offer, except that, pursuant to S.C. Code Ann. § 58-41-20(A), it is for use for qualifying small power production facilities that are not eligible for the Standard Offer, i.e., QF facilities that are greater than 2 MW in size. The statute also requires that Form PPAs contain provisions for force majeure, indemnification, choice of venue, confidentiality provisions, and other such terms. However, the Form PPA is not determinative of the price or duration of the contract and these issues are to be separately negotiated by the Company and the applicable QF.

47. Consistent with and pursuant to the Commission’s scheduling Order, the Company will develop and propose a reasonable and prudent Rate PR-Form PPA for review and approval by the Commission that satisfies the requirements of PURPA, FERC’s implementing regulations and guidelines, and Act No. 62; is just and reasonable; is non-discriminatory to small power producers; and has the ability to reduce the risk placed on the using and consuming public. The proposed Form PPA will contain appropriate terms for environmental liability; curtailment of service; Force Majeure; indemnification; damage repair; and other commercially reasonable terms and provisions.²

48. The Company proposes that, consistent with the current Form PPA approved in Order No. 2019-847, the Form PPA be limited to a period of ten years.

² The Company’s Rate PR-Storage tariff approved in Order No. 2020-552 issued in Docket No. 2019-393-E on August 18, 2020, will continue to apply to proposed projects incorporating storage, subject to availability.

Commitment to Sell Form

49. Act No. 62 also mandates that QFs “have the right to sell the output of its facility to the electrical utility at the avoided cost rates and pursuant to the power purchase agreement then in effect by delivering an executed notice of commitment to sell form to the electrical utility.” S.C. Code Ann. § 58-41-20(D).

50. This standard NOC Form is required to provide the QF a reasonable period of time from its submittal of the form to execute a PPA but shall not require a QF, “as a condition of preserving the pricing and terms and conditions established by its submittal of an executed [NOC Form] to the electrical utility, ... to execute a [PPA] prior to receipt of a final interconnection agreement from the electrical utility.” *Id.*

51. Consistent with and pursuant to the Commission’s scheduling Order, the Company will submit a proposed NOC Form as part of filing its direct testimony in this proceeding. The proposed NOC Form will contain prudent and commercially reasonable terms for its application, operation, day-in-service deadline, eligibility pre-conditions, termination, interconnection facilities, damages, seller termination payments, and other appropriate and commercially reasonable terms. The Company will propose a NOC Form that is just and reasonable; provides small power producers a reasonable time from the submittal of the form to execute a PPA; satisfies the requirements of PURPA, FERC’s implementing regulations and guidelines, and Act No. 62; is non-discriminatory to small power producers; and reduces the risk placed on the using and consuming public.

52. The proposed NOC Form will also contain terms and conditions for projects with and without battery storage capabilities, depending on the QF’s operations.

Other Appropriate Terms and Conditions

53. Act No. 62 authorizes the Commission to approve other terms and conditions as may be required to implement the requirements of S.C. Code Ann. § 58-41-20. Consistent with and pursuant to the Commission's scheduling Order, the Company may propose other terms and conditions as may be reasonable and prudent and necessary to further the purposes of Act No. 62.

Prayer for Relief

54. Wherefore, DESC prays that the Commission
- (a) consider, review, and approve the materials and information to be submitted as part of the filing process in this proceeding and approve the Company's proposed standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and all other appropriate terms and conditions.
 - (b) approve an updated variable integration charge and the accompanying true-up required by Order No. 2020-244.
 - (c) approve the Company's proposed Rate PR-1, Rate PR-Standard Offer, Rate PR-Form PPA tariffs, and NOC Form, and also approve the continuation of the Form PR-Avoided Costs Methodology tariff.
 - (d) grant DESC such further, different, or other relief as may be warranted, just, reasonable, and lawful.

Signature Block on Next Page

Respectfully submitted,

K. Chad Burgess, Esquire
Matthew W. Gissendanner, Esquire
Dominion Energy South Carolina
Mail Code C222
220 Operation Way
Cayce, South Carolina 29033-3701
Phone: (803) 217-8141 (KCB)
(803) 217-5359 (MWG)
kenneth.burgess@dominionenergy.com
matthew.gissendanner@dominionenergy.com

s/Tracey C. Green
Tracey C. Green, Esquire
Mitchell M. Willoughby, Esquire
Willoughby & Hoefler, P.A.
P.O. Box 8416
Columbia, SC 29202
Phone: (803) 771-2121 (MMW)
(803) 771-2128 (TCG)
mwilloughby@willoughbyhoefler.com
tgreen@willoughbyhoefler.com

Attorneys for Dominion Energy South Carolina, Inc.

Columbia, South Carolina
April 22, 2021